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Attorneys for Defendant,
STEWART TITLE GUARANTY COMPANY

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

MARINERS PAC VENTURES, LLC,
Plaintiff,

vs.

STEWART TITLE GUARANTY
COMPANY; STEWART TITLE OF
NEVADA – LAS VEGAS DIVISION; DOE
INDIVIDUALS I through X; and ROE
CORPORATIONS XI through XX, inclusive,,
Defendants.

CASE NO. 2:21-cv-02120-JCM-BNW

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT [ECF No. 1]**

[First Request]

Defendant Stewart Title Guaranty Company (“STGC”), by and through its attorneys of record, the law firm of MAURICE WOOD, and Plaintiff Mariners PAC Ventures LLC (“Plaintiff”), by and through its counsel of record, WRIGHT FINLAY & ZAK, hereby stipulate and agree as follows:

1. On July 1, 2021, Plaintiff filed its Complaint in the Eighth Judicial District Court, Case No. Case No. A-21-837293-C. See ECF No. 1-1.

2. On November 29, 2021, STGC filed a Petition for Removal with this Court, based upon diversity jurisdiction. See ECF No. 1.

3. STGC’s deadline to file an Answer or otherwise respond to Plaintiff’s Complaint is currently December 3, 2021. See id.

4. Plaintiff's counsel has requested an opportunity to explore the possibility of settlement before engaging in motion practice.

5. Accordingly, STGC requests an extension of sixty (60) days from the current deadline, until February 4, 2022, to file an answer or otherwise respond to Plaintiff's Complaint.

6. This additional time will allow the parties to engage more substantive discussions regarding the potential resolution of the litigation without motion practice.

7. Counsel for Plaintiff does not oppose the requested extension.

8. This is the first request for an extension, brought in good faith and not for purposes of delay.

DATED this 6th day of December, 2021.

MAURICE WOOD

By: /s/ Elizabeth E. Aronson

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Attorneys for Defendant

DATED this 6th day of December, 2021.

WRIGHT FINLAY & ZAK, LLP

By: /s/ Lindsay D. Dragon

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Attorneys for Plaintiff

Order

IT IS SO ORDERED

DATED: 10:44 am, December 07, 2021

BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

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